

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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1199 SEIU UNITED HEALTHCARE WORKERS  
EAST,

Plaintiff,

v.

SPLIT ROCK REHABILITATION  
AND HEALTH CARE CENTER,

Defendant.  
-----X

**ANSWER**

Case No. CV-07-8652(PAC)

SPLIT ROCK REHABILITATION AND HEALTH CARE CENTER (hereinafter referred to as "Defendant"), by its attorneys, Naness, Chalet & Naness, LLC, answers the complaint of 1199 SEIU UNITED HEALTHCARE WORKERS EAST (hereinafter referred to as "Plaintiff") and alleges as follows:

1. Defendant admits the allegations set forth in paragraph 1 of the Complaint.
2. Defendant admits the allegations set forth in paragraph 2 of the Complaint.
3. Defendant admits the allegations set forth in paragraph 3 of the Complaint.
4. Defendant admits the allegations set forth in paragraph 4 of the Complaint.
5. Defendant admits the allegations set forth in paragraph 5 of the Complaint.
6. Defendant admits the allegations set forth in paragraph 6 of the Complaint.
7. Defendant admits the allegations set forth in paragraph 7 of the Complaint.
8. Defendant admits the allegations set forth in paragraph 8 of the Complaint.
9. Defendant admits the allegations set forth in paragraph 9 of the Complaint.
10. Defendant admits the allegations set forth in paragraph 10 of the Complaint.
11. Defendant admits the allegations set forth in paragraph 11 of the Complaint.

12. Defendant admits the allegations set forth in paragraph 12 of the Complaint.
13. Defendant admits the allegations set forth in paragraph 13 of the Complaint.
14. Defendant repeats and re-alleges the allegations set forth in paragraphs 1 through 13 as set forth more fully above.
15. Defendant admits the allegations set forth in paragraph 15 of the Complaint.
16. Defendant admits the allegations set forth in paragraph 16 of the Complaint.
17. Defendant admits the allegations set forth in paragraph 17 of the Complaint.
18. Defendant admits the allegations set forth in paragraph 18 of the Complaint.
19. Defendant denies the allegations set forth in paragraph 19 of the Complaint.

Wherefore Defendant requests that Court issue an Order dismissing the complaint and for such other relief as the Court may deem proper.

Dated at Jericho, New York  
November 5, 2007



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